

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**CHERYL BUTLER**

*Plaintiff,*

**V.**

**JENNIFER P. COLLINS,  
STEVEN C. CURRALL, ROY R.  
ANDERSON, JULIE PATTERSON  
FORRESTER, HAROLD STANLEY,  
PAUL J. WARD, AND SOUTHERN  
METHODIST UNIVERSITY**

*Defendants,*

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**CIVIL ACTION NO.: 3:18-cv-00037**  
**JURY DEMANDED**

## OPPOSED AMENDED MOTION TO WITHDRAW AS COUNSEL

COMES NOW, TB Robinson Law Group, PLLC, specifically attorneys Terrence B. Robinson and Gabrielle O. Ilochi, moving to withdraw as counsel of record for the Plaintiff, CHERYL BUTLER, showing as follows:

1. The Plaintiff retained Terrence B. Robinson of TB Robinson Law Group, PLLC, to represent her in this action.
2. This motion is based on good cause in that counsel's withdrawal is in accordance with the terms of their retention by Plaintiff and that an irreconcilable conflict has arisen between the Plaintiff and the undersigned counsel that makes further representation by the undersigned impossible.
3. On October 28, 2019, during an in-person conference with Plaintiff, counsel expressed its intention to withdraw due to multiple reoccurring, fundamental disagreements.

4. Immediately following the conference, on October 28, 2019, Plaintiff sent an email communication with the unmistakable purpose and direction to sever the attorney-client relationship, immediately terminating representation by counsels of record.
5. **Subsequently, counsel emailed Plaintiff, Cheryl Butler, a copy of an Amended Motion to Withdraw as Counsel for Plaintiff's signature and communicated with Plaintiff regarding said amended motion. Plaintiff refused to sign an Amended Motion to Withdraw as Counsel even though Plaintiff, via email communication on October 28, 2019, clearly terminated undersigned counsel's representation and the parties share in the belief that said representation must be terminated and is irreconcilable.**
6. The following deadlines/scheduling issues are pending in this case:

|                                                                       |                 |
|-----------------------------------------------------------------------|-----------------|
| <i>Rebuttal to Defendant's Designation of Experts</i>                 | <i>11/02/19</i> |
| <i>Discovery Deadline</i>                                             | <i>12/02/19</i> |
| <i>Mediation Deadline</i>                                             | <i>12/02/19</i> |
| <i>Motion to Compel Discovery or Impose Sanctions</i>                 | <i>12/09/19</i> |
| <i>Dispositive and Nondispositive Motions Deadline</i>                | <i>12/16/19</i> |
| <i>Pretrial Disclosures, Materials, and Objections Deadline</i>       | <i>04/06/20</i> |
| <i>Settlement Conference</i>                                          | <i>04/06/20</i> |
| <i>Serve and File Disclosure List Deadline</i>                        | <i>04/20/20</i> |
| <i>Objections to Pretrial Material and Motions in Limine Deadline</i> | <i>04/20/20</i> |
| <i>Pretrial Conference Deadline</i>                                   | <i>05/01/20</i> |
| <i>Trial Date</i>                                                     | <i>05/04/20</i> |
7. Plaintiff's address is 3341 Charleston Street, Houston, TX 77021, telephone number 713-

828-3958, and email address [cherylbutler2002@gmail.com](mailto:cherylbutler2002@gmail.com).

8. The withdrawal is not sought for the purpose of delay.
9. Plaintiff will not be prejudiced or injured by allowing counsel to withdraw as attorney of record. Movants request that the remainder scheduling deadlines, as referenced herein, be abated for sixty (60) days in order for Plaintiff to secure new local counsel.

**PRAYER**

Movants, Terrence B. Robinson and Gabrielle O. Ilochi, request that they be allowed to withdraw as attorneys of record for Plaintiff.

Respectfully submitted,  
TB Robinson Law Group, PLLC



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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

On October 29, 2019, Movants and counsel for Defendants conferred via telephone in this matter. Opposing counsel's opposition to this Motion is due to its contention with Movants' suggested sixty (60) day extension of scheduling order deadlines.



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Terrence B. Robinson  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 31st day of October, 2019, the foregoing *OPPOSED AMENDED MOTION TO WITHDRAW* was electronically filed with the Clerk of the Court using the CM/ECF system and served on all attorney(s) and/or parties of record via the CM/ECF service.



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